



Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

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Federal Communications Commission

Office of Secretary

Re: Mobile Satellite Ventures Subsidiary LLC

Ex Parte Presentation IB Docket No. 01-185

File No. SAT-MOD-20031118-00333 (ATC application) File No. SAT-AMD-20031118-00332 (ATC application) File No. SES-MOD-20031118-01879 (ATC application)

Dear Ms. Dortch:

Glentel Inc. hereby urges the Commission to afford L-band Mobile Satellite Service ("MSS") operators greater flexibility in their provision of an Ancillary Terrestrial Component ("ATC"), as requested by Mobile Satellite Ventures LP ("MSV") in the above-captioned proceedings. The increased flexibility requested by MSV will ensure that next-generation MSS systems in the L-band can realize the ubiquitous coverage, capacity and economies of scale needed for a true consumer service. The result of not granting this increased flexibility will be a relegation of satellite to a niche service catering to price-insensitive users operating in remote areas. Economic growth and corporate competitiveness will not be realized.

Glentel Inc. has provided MSS since 1996 using the L-band satellites of MSV and Mobile Satellite Ventures (Canada) Inc. Glentel Inc. currently provides voice, data, facsimile, dispatch and packet data services to the Natural Resource, Government, Utility, Transportation and Tourism sectors throughout the United States and Canada.

While Glentel Inc. has developed a viable business using current-generation MSS satellites to serve niche markets, we are excited about the future potential for MSS when supplemented with ATC. To date, MSS has been characterized by suitcase-sized user terminals, limited coverage, low data rates and equipment and service prices far exceeding that offered by terrestrial wireless operators. Because the market for this type of service is small, the economies of scale needed to drive down equipment and service prices have not developed. With ATC, MSS has the potential to evolve into a true consumer service. ATC will provide the coverage, capacity and economies of scale needed to bring MSS equipment and service prices to affordable levels. Moreover, by overcoming satellite signal limitations inherent in urban areas, ATC will allow MSS to become a truly ubiquitous service, meeting the business, safety and security demands of corporations and consumers not only in rural and remote areas but also in the most densely populated urban cores.

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Glentel Inc. believes that if MSV does not succeed in its development of a next-generation MSS system, Inmarsat will have a monopoly in the L-band MSS market in the United States. With no competitive pressure, Glentel suggests the market will continue to face economic barriers relative to the rates, terms and conditions of L-band services. It is anticipated that L-band MSS service providers will continue to struggle to survive, resulting in bankruptcies, job losses and a step backward in the slowly rebounding telecommunications sector. Moreover, the prospects for innovation in L-band MSS technology will be limited at best. L-band MSS will remain locked in time as an obsolete service useful for only select users in remote areas.

Glentel Inc. understands concerns of spectral efficiencies and of potential interference which may be attributed to MSV's development of a next-generation MSS system, concerns we believe are overstated and speculative. For example, customers do not use their satellite only terminals in areas where MSV is expected to deploy base stations to overcome satellite blockage. By definition, if MSV needs to deploy an ATC base station to overcome signal blockage, the satellite-only terminals will not work effectively in those areas.

The Commission holds in its decision the future of the MSS technology and industry sector itself. Glentel Inc. urges the Commission to follow the path of free market competition, innovation and better consumer service by adopting MSV's proposals for increased flexibility for ATC in the L-band.

Respectively,

D. Lawndes

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